

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	:	PROMESA
	:	Title III
as representative of	:	Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
Debtors. <sup>1</sup>	:	

**VERIFIED STATEMENT OF COHEN, WEISS AND SIMON LLP PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019 AND ORDER REGARDING  
APPLICABILITY OF F.R.B.P. 2019 TO THE TITLE III CASES AND A FURTHER  
PROPOSED AMENDMENT TO THE CASE MANAGEMENT ORDER [DKT. ENTRY  
NO. 754]**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure and in response to the Court's *Order Regarding the Applicability of F.R.B.P. 2019 to The Title III Cases and A Further Proposed Amendment to The Case Management Order* [Docket Entry No. 754], the law firm of Cohen, Weiss and Simon LLP ("CWS") gives notice of representation of more than one creditor in the above-captioned bankruptcy case, and states as follows:

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<sup>1</sup> The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

1. CWS represents the following creditors in the above-captioned case:
  - (a) International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) (“UAW”)  
8000 East Jefferson Avenue  
Detroit, MI 48214
  - (b) Service Employees International Union (“SEIU”)  
1800 Massachusetts Avenue, NW  
Washington, DC 20036
2. The UAW and SEIU (collectively “the Unions”) have claims against certain of the Debtors in amounts not yet determined. The Unions hold contingent and non-contingent claims, not currently liquidated, against the Commonwealth and/or its instrumentalities based on (1) pay, benefits and other terms of employment owing to the Unions’ members under collective bargaining agreements with the Commonwealth and/or its instrumentalities, including but not limited to (a) pay, benefits and other terms of employment claimed in pre-petition union grievances and arbitrations and (b) pay, benefits and other terms of employment denied employees as a result of pre-petition legislative, executive or other unilateral action by the Commonwealth; and (2) pension and other post-employment benefits that the Unions’ members have accrued as a result of their employment with the Commonwealth and/or its instrumentalities.
3. CWS was engaged by the Unions in May 2017 at the instance of the Unions.
4. CWS has no claims or interests against any of the title III Debtors.
5. CWS reserves the right to amend this Verified Statement.
6. The undersigned verifies that the foregoing Verified Statement is true and accurate to the best of the undersigned’s knowledge, information, and belief.

Dated: August 15, 2017

Respectfully submitted,

/s/ Peter D. DeChiara

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Attorneys for International Union, United  
Automobile, Aerospace and Agricultural Implement  
Workers of America (UAW) and Service  
Employees International Union

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of August, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Court-approved Case Management Procedures in this case.

Dated: August 15, 2017

/s/ Hiram M. Arnaud  
HIRAM M. ARNAUD